

# **Exhibit 4**

1 M. ELIZABETH DAY (SBN 177125)

2 eday@feinday.com

3 DAVID ALBERTI (SBN 220265)

4 dalberti@feinday.com

5 SAL LIM (SBN 211836)

6 slim@feinday.com

7 MARC BELLOLI (SBN 244290)

8 mbelloli@feinday.com

9 HONG SYD LIN (SBN 249898)

10 hlin@feinday.com

11 NICHOLAS V. MARTINI (SBN  
12 237687)

13 nmartini@feinday.com

14 **FEINBERG DAY**

15 **KRAMER ALBERTI LIM**

16 **TONKOVICH & BELLOLI LLP**

17 577 Airport Blvd., Suite 250

18 Burlingame, CA. 94010

19 Tel: 650 825-4300

20 Fax: 650 460-8443

21 Attorneys for Uniloc 2017 LLC

22 UNITED STATES DISTRICT COURT

23 CENTRAL DISTRICT OF CALIFORNIA

24 UNILOC 2017 LLC,

25 Plaintiff,

26 v.

27 NETFLIX, INC.,

28 Defendant.

**LEAD CONSOLIDATED CASE:  
NO. SACV18-02055-GW-DFM**

CASE NO. 8:18-cv-02150-GW-DFM

**PLAINTIFF'S SUPPLEMENTAL  
RESPONSE TO NETFLIX, INC.'S  
SECOND SET OF  
INTERROGATORIES NOS. 11-13**

1 representation that the failures of the prior assignees to pay the maintenance fee  
2 was unintentional, and the identities of the persons with knowledge of these facts.

3 **RESPONSE TO INTERROGATORY NO. 12:**

4 Plaintiff objects to this request to the extent it seeks information protected  
5 from discovery by the attorney-client privilege. Plaintiff further objects to this  
6 request as seeking information that is not relevant to a claim or defense. Subject to  
7 and without waiving the foregoing general and specific objections, Plaintiff  
8 responds as follows: Mr. Burdick of Burdick Patents handles maintenance fee  
9 payments for Uniloc 2017. Mr. Burdick and Burdick Patents possess all  
10 responsive information to this interrogatory.

11 **INTERROGATORY NO. 13:**

12 Describe all past and present relationships between and among any of the  
13 following entities: Uniloc 2017 LLC; Uniloc Luxembourg S.A.; Uniloc  
14 Corporation Pty, Ltd.; CF Uniloc Holdings LLC; Uniloc Licensing USA LLC;  
15 Uniloc USA, Inc.; Fortress Investment Group LLC; and Fortress Credit Co LLC;  
16 including but not limited to any parent-child, subsidiary, ownership, partial  
17 ownership, joint venture, and/or profit sharing relationships and any relationships  
18 related to the Patents-in-Suit and/or this case.

19 **RESPONSE TO INTERROGATORY NO. 13:**

20 Plaintiff objects to this request to the extent it seeks information protected  
21 from discovery by the attorney-client privilege. Plaintiff further objects to this  
22 request as seeking information that is not relevant to a claim or defense. Subject to  
23 and without waiving the foregoing general and specific objections, Plaintiff  
24 responds as follows: Pursuant to Rule 33(d), Uniloc will identify documents  
25 responsive to this interrogatory.

26 **SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 13:**

27 Plaintiff objects to this request to the extent it seeks information protected  
28 from discovery by the attorney-client privilege. Plaintiff further objects to this

1 request as seeking information that is not relevant to a claim or defense, nor  
2 proportional to the needs of the case. Subject to and without waiving the foregoing  
3 general and specific objections, Plaintiff responds as follows: Pursuant to Rule  
4 33(d), Uniloc identifies the following documents responsive to this interrogatory  
5 with respect to Uniloc 2017 LLC; Uniloc Luxembourg S.A.; Uniloc Corporation  
6 Pty, Ltd.; CF Uniloc Holdings LLC; Uniloc Licensing USA LLC; Uniloc USA,  
7 Inc.: UNILOC\_0000776-1327, UNILOC\_0001597-5241, UNILOC\_0008905-  
8 16003.

9  
10 Dated: July 7, 2020

/s/ M. Elizabeth Day  
M. Elizabeth Day

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12 Attorneys for Plaintiff  
13 Uniloc 2017 LLC  
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